

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN WITT, *et al.*

Plaintiffs,

v.

Civil Action No. 3:15cv00386-REP

CORELOGIC SAFERENT, LLC, *et al.*

Defendants.

**CORELOGIC NATIONAL BACKGROUND DATA, LLC’S
MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

Defendant, CoreLogic National Background Data, LLC (“NBD”), by counsel, and pursuant to Fed. R. Civ. P. 12(b)(2), 12(b)(3), 12(b)(6), and 28 U.S.C. § 1406(a), submits this Motion to Dismiss, or in the Alternative, to Transfer Venue. The reasons in support of the motion are set forth in the accompanying memorandum.

WHEREFORE, Defendant, CoreLogic National Background Data, LLC, requests that the Court enter an order (1) dismissing this case with prejudice with respect to Plaintiffs Henderson and Hines; (2) dismissing the case for lack of personal jurisdiction with respect to the claims of Plaintiff Moore; (3) dismissing the claims of the fourteen Plaintiffs; and (4) dismissing the remaining claims for improper venue. In the alternative, NBD requests that the matter be transferred to the United States District Court for the District of Maryland.

**CORELOGIC NATIONAL BACKGROUND
DATA, LLC**

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following CM/ECF participants:

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